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RONALD YEE
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 v.

15 KING CHUEN TANG a/k/a CHEN TANG,
16 RONALD YEE, ZISEN YU, JOSEPH SETO,
MING SIU, KING S. TANG a/k/a JAMES K.
17 TANG, and YING KIT YU a/k/a EDDIE YU,

18 Defendants.

19 and

20 VENTURE ASSOCIATES FUND I, TANG
CAPITAL PARTNERS, ACCELERATION
21 CAPITAL PARTNERS, AMERICAN
PEGASUS LONG SHORT FUND
22 SEGREGATED PORTFOLIO, PING LEE
TANG, KA LING LEE, YIN LEE KA,
23 CHEUNG-TING KA, SYLVIA TSUI, DOI
PING SIU, YUEN-LAI MA, LEUNG-KEE
24 SIU, ROSALIE CHO, and MINOR CHILD I
and MINOR CHILD II, minor children of
25 Defendant King Chuen Tang a/k/a Chen Tang,

26 Relief Defendants.

Case No. 3:09-cv-05146-JCS

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
FILE DISPOSITIVE MOTIONS**

Judge: Hon. Joseph C. Spero

Date Comp. Filed: October 11, 2009

Trial Date: February 13, 2012

WHEREAS, on May 17, 2011, the Court issued a Further Case Management and Pretrial Order setting November 4, 2011 as the hearing date for motions for dispositive motions and further ordered that reply briefs be submitted no less than four weeks prior to the hearing date (Dkt. No. 161);

WHEREAS, on August 29, 2011 the Court issued an order (at the parties' request) extending the discovery cutoff date until September 30, 2011 (Dkt. No. 170);

WHEREAS, the present schedule would therefore require dispositive motions to be filed prior to the close of fact discovery in the case;

WHEREAS, the parties respectfully submit that it is therefore in the interest of the parties to continue the hearing date for dispositive motions until December 2, 2011 (or such other date in December that is convenient for the Court);

WHEREAS, the parties respectfully request that all dispositive motions are to be filed by October 7, 2011; oppositions to such motions are to be filed by October 21, 2011; and replies are to be filed by November 7, 2011;

WHEREAS, extending the hearing date for dispositive motions would not have any effect on any other deadlines set by this Court;

IT IS STIPULATED, pursuant to Civil L.R. 6-1(b), 6-2(a) and 7-12, by and between the undersigned counsel for the Parties, that:

1. The hearing date for dispositive motions shall be extended to December 2, 2011, and the parties shall file dispositive motions on the dates set forth above.

2. All other dates set pursuant to the Court's Further Case Management and Pretrial Order of May 17, 2011 shall remain in place.

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1 IT IS SO STIPULATED.

2 Respectfully submitted,

3 Dated: September 16, 2011

SECURITIES AND EXCHANGE
COMMISSION

6 By: /s/ Jennifer D. Brandt

JENNIFER D. BRANDT
Attorney for Plaintiff

8 Dated: September 16, 2011

KEKER & VAN NEST LLP

11 By: /s/ Michael D. Celio

MICHAEL D. CELIO
Attorneys for Defendant Ronald Yee

13 Dated: September 16, 2011

FENWICK & WEST

16 By: /s/ Christopher Steskal

CHRISTOPHER STESKAL
Attorneys for Defendant Ming Sui

17 Dated: September 16, 2011

SHARTSIS FRIESE LLP

20 By: /s/ Jahan P. Raissi

JAHAN P. RAISSI.
Counsel for Defendant King Chuen Tang
a/k/a Chen Tang and Relief Defendants,
Tang Capital Partners, Venture Associates
Fund I, Minor Child I and Minor Child II,
Ping Lee

Dated: September 16, 2011

RAMSEY & EHRLICH LLP

By: /s/ Ismail Ramsey

ISMAIL RAMSEY

Counsel for Defendant Zisen Yu and Relief
Defendant Acceleration Capital Partners

Dated: September 16, 2011

SUGARMAN & CANNON

By: /s/ Christopher J. Cannon

CHRISTOPHER J. CANNON, ESQ.

Counsel for Defendant Joseph Seto

Dated: September 16, 2011

By: /s/ Hugh Anthony Levine

HUGH ANTHONY LEVINE.

Counsel for Defendant Ying Kit Yu a/k/a
Eddie Yu

Dated: September 16, 2011

BROWN WHITE & NEWHOUSE LLP

By: /s/ Thomas Brown

THOMAS BROWN

Counsel for Defendant King S. Tang a/k/a
James S. Tang and Relief Defendant
Rosalie Cho

Dated: September 16, 2011

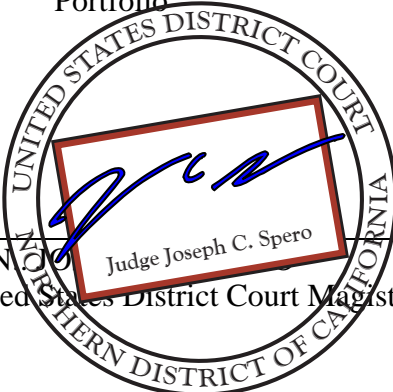
SPARER LAW GROUP

By: /s/ Alan W. Sparer

ALAN W. SPARER.
Counsel for Relief Defendant American
Pegasus Long Short Fund Segregated
Portfolio

IT IS SO ORDERED.

Date: 09/21/2011


HONORABLE
United States District Court Magistrate Judge

I, Michael D. Celio am the ECF user whose ID and password are being used to file this
STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE
DISPOSITIVE MOTIONS. In compliance with General Order 45, X.B., I hereby attest that all
signatories have concurred in this filing.